

1 Katherine F. Parks, Esq. - State Bar No. 6227
2 Thorndal Armstrong Delk Balkenbush & Eisinger
3 6590 S. McCarran Blvd., Suite B
4 Reno, Nevada 89509
(775) 786-2882
kfp@thorndal.com
5 Attorneys for Defendants
DOUGLAS COUNTY, SCOTT SHICK, AND
6 VICTORIA SAUER-LAMB

7 **UNITED STATES DISTRICT COURT**
8
DISTRICT OF NEVADA
9

10 JOHN ENOS, an individual,
11 Plaintiff,
12 vs.
13

14 DOUGLAS COUNTY, a political subdivision of
the State of Nevada; SCOTT SHICK, Chief
15 Juvenile Probation Officer of the Juvenile
Probation Department; VICTORIA SAUER-
16 LAMB, Supervisor of the Juvenile Probation
Department; NATHAN TOD YOUNG, Judge of
the Ninth Judicial District Court of the State of
17 Nevada; MICHAEL GIBBONS, Former Judge
of the Ninth Judicial District Court of Nevada;
18 THE STATE OF NEVADA *ex rel.* Nathan Todd
Young and Michael Gibbons; DOE
19 GOVERNMENTAL ENTITIES 1-10; DOE
BUSINESS ENTITIES 1-10; and DOE
20 INDIVIDUALS 4-50,
21
22 Defendants.
23

CASE NO. 3:17-cv-00095-MMD-VPC

STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME TO FILE
OPPOSITION TO MOTIONS FOR
PARTIAL SUMMARY JUDGMENT
[ECF No. 106 and 107]

[Second Request]

24
25 COME NOW Defendants, DOUGLAS COUNTY, SCOTT SHICK, and VICTORIA
26 SAUER-LAMB, and Plaintiff, JOHN ENOS, by and through their attorneys of record, and
27 hereby request an extension of time for the parties to file their oppositions to the motions for
28 partial summary judgment [ECF No. 106 and ECF No. 107] filed on July 12, 2019.

1 The oppositions are currently due on August 16, 2019, and the parties request an
2 additional two week extension of time through and until August 30, 2019, to file their
3 oppositions to the motions for partial summary judgment. This is the parties' second request to
4 extend said deadline. The parties submit that this second request is not for the purpose of undue
5 delay but is related to caseload and calendaring issues, as well as staffing issues recently
6 experienced by the law firm for counsel for the Defendants.

DATED this 12th day of August, 2019.

THE GEDDES LAW FIRM, P.C.

By: / s / **William Geddes**

William J. Geddes, Esq.
Kristen Geddes, Esq.
8600 Technology Way,
Reno, Nevada 89521
(775) 853-9455

DATED this 12th day of August, 2019.

THE PALMER LAW FIRM, P.C.

By: / s / **Raelene K. Palmer, Esq.**

Raelene K. Palmer, Esq.
5550 Painted Mirage Road, Suite 320
Las Vegas, Nevada 89149
(702) 952-9533
rpalmer@plflawyers.com
Attorneys for Plaintiff
John Enos

DATED this 12th day of August, 2019.

**THORNDAL ARMSTRONG DELK
BALKENBUSH & EISINGER**

By: / s / Katherine F. Parks

Katherine F. Parks, Esq.
State Bar No. 6227
6590 S. McCarran Blvd., Suite B
Reno, Nevada 89509
(775) 786-2882

kfp@thorndal.com
Attorneys for Defendants
DOUGLAS COUNTY, SCOTT SHICK, AND
VICTORIA SAUER-LAMB

ORDER

IT IS SO ORDERED.

DATED August 13, 2019.

019.

DISTRICT COURT JUDGE